

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ACE AMERICAN INSURANCE COMPANY,  
a/s/o SIDNEY FRIEDMAN

Plaintiff,

Docket No. 08 CV 4315  
(BSJ) (AJP)

NOTICE OF MOTION TO  
VACATE DEFAULT AND  
IN OPPOSITION TO  
INQUEST

-against-

JEFFSTAR MARINE SERVICES and  
JEFFSTAR Inc.

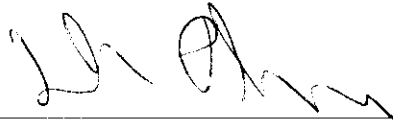
Defendants.  
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SIRS:

PLEASE TAKE NOTICE, that upon the affidavit of Dominic Aracci sworn to July 14, 2008, the exhibits annexed hereto; a Memorandum of Law and upon the pleadings and proceedings heretofore had herein, the undersigned will move this Court at the United States Courthouse located at 500 Pearl Street, New York, N.Y. on the 23rd day of July, 2008 at 9:30 o'clock in the forenoon of that day or as soon thereafter a counsel can be heard for an Order:

- (1) Pursuant to FRCP §55(c) and 60(b)(1)(6) to vacate the Defendant, Jeffstar Marine Services Inc.'s default and permit said Defendant to impose its Answer in this matter; and
- (2) For such other and further relief this Court deems just and proper.

Dated: Garden City, New York  
September 25, 2007



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By: Daniel R. Olivieri, Esq.(DRO9969)  
LAW OFFICE OF DANIEL R. OLIVIERI, P.C  
Attorney for the Defendant,  
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Your File No.: 2320-30